WESTON SOLUTIONS, INC.
205 CAMPUS DRIVE
EDISON, NEW JERSEY 08837
732-417-5800 • FAX: 732-417-5801

The Trusted Integrator for Sustainable Solutions

May 3, 2010

John Gorman
Acting Chief, Pesticides & Toxic Substances Branch
U.S. EPA Region II
2890 Woodbridge Avenue (MS-105)
Edison, NJ 08837-3679

Re: Response to EPA April 9, 2010 Comments to RAWP Addendum No. 3
Hatco Chemical Corporation
1020 King George Post Road
Fords, Woodbridge Twp, Middlesex County, NJ
SRP PI No.: G000003943, EA No.: RPC000001

Dear Mr. Gorman:

This letter provides Weston Solutions, Inc's (Weston®) response to the U.S. Environmental Protection Agency's (USEPA) letter dated 9 April 2010 regarding USEPA's review of the above referenced document prepared by Weston. The USEPA comments presented in the 9 April 2010 correspondence are reiterated below, with Weston's response following each comment.

General Comments

Consistency with Weston's Interim Remedial Measures (IRM) Remedial Action Workplan (RAWP): Since the time that Addendum 3 was initially submitted to EPA, the Agency has reviewed and approved Weston's IRM RAWP for the removal of light non-aqueous phase liquid (LNAPL). The approved IRM RAWP contains information that is inconsistent with the information provided in Addendum 3 (for example, there are inconsistencies in the cleanup approach and in the sampling of distinct phases). Please confirm that the updated information in the IRM RAWP supersedes the information contained in Addendum 3.

Weston Response: Weston confirms that the updated information in the IRM RAWP supersedes the information contained in Addendum 3.

The Northeast and Morris Ponds: Addendum 3 does not specifically address remediation of the Northeast and Morris Ponds, although Weston is planning on performing sampling within these areas. Therefore, please note that the Agency's ultimate approval of Addendum 3 will not include the remediation of these ponds.

Weston Response: Noted.

Decontamination: The decontamination procedures specified in the document do not appear to comply with the requirements of 40 CFR 761.79. Weston must ensure that all decontamination activities are performed in accordance with the Federal PCB regulations.

Weston Response: Weston is requesting a waiver from EPA for decontamination of non-porous surfaces (and non-porous surfaces covered with a porous surface, such as paint) as specified by 40 CFR 761.79(h). Weston does not intend to decontaminate any porous remediation materials; instead, porous materials and investigation-derived wastes will be disposed of as TSCA waste in accordance with 40 CFR 761.79(g).

Weston will perform equipment, tool and sampling equipment decontamination for intrusive work in all areas which PCB contamination is known or suspected to be present above TSCA concentrations, utilizing an alternative sampling protocol. The procedure to be utilized on non-porous surfaces includes:

1. Removal of gross contamination (e.g., excess soils, product) through scraping and/or wiping with an absorbent cloth, or through the use of a stiff-bristled brush;
2. Application of a PCB solvent foam (Weston proposes Capsur®) in accordance with manufacturer's instructions; for painted surfaces which may be damaged by a product such as Capsur®, an alternate solvent which meets the requirements of 40 CFR 761.79(d) will be utilized.
3. Allow the solvent coated surface to sit for a minimum of 5 minutes;
4. High pressure, hot water rinse;
5. Visual inspection of decontaminated surface to ensure removal of visual contamination and solvent material;
6. Air dry;
7. Collection of wipe samples from multiple unique surfaces of the equipment which could have potentially come into contact with contamination material.

Decontamination will be performed upon completion of intrusive remediation activities, or if heavy equipment must be moved outside the exclusion zone at any time. Decontamination will be performed atop a decontamination pad constructed in such a manner as to capture all decontamination fluids; these fluids will be containerized for disposal as required in 40 CFR 761.79(g). Weston will perform a "patch test" of the Capsur® on painted equipment to evaluate its effects on painted surfaces prior to full-scale use.

Wipe samples will be collected prior to release from site or release from the exclusion zone, to ensure that decontamination is sufficient to meet the re-use requirements of 40 CFR 761(b)(3)(i). Wipe testing will be performed in accordance with 40 CFR 761.123, with one wipe sample collected from each unique surface or component of the decontaminated equipment which may have been in contact with site soils. One wipe sample will be collected per type of equipment surface; e.g., for an excavator, one sample will be collected representative of the tracks, one sample will be collected representative of the bucket, and one sample will be collected representative of the equipment underside.

Once wipe sample results have confirmed decontamination has met the objectives of 40 CFR 761.79(b)(3)(i), the equipment may be released from the site for re-use. Should wipe samples fail to confirm sufficient decontamination, the above process will be repeated.

Epic Polymers: Please provide EPA with an update on the status of discussions with Epic Polymers, regarding the PCBs found on their property.

Weston Response: Weston is still waiting to hear back from EPEC regarding their allowing us access onto their property to perform the required sampling. We will keep you posted.

Attachment 1 – Post-Excavation Sampling and Analysis Plan (PESAP)

On-Site Non-LNAPL Contamination Areas and Off-Site Contamination Areas: Weston is proposing the collection of post excavation samples from each 900 square feet of excavation footprint. EPA believes that collecting one sample from each 400 square feet of excavation footprint is more appropriate for use in these areas. While less stringent than the requirements of 40 CFR Subpart O, this grid size will provide a sufficient level of confidence that the areas are sufficiently remediated.

Weston Response: Weston suggests complying with EPA's requirement to reduce our post-excavation sampling grid size to 20x20 in those areas where PCBs have been detected at concentrations above the TSCA limit. For those areas where PCBs are/have been present at concentrations of less than 50 ppm, we will default to the NJDEP-specified sampling frequency of 30x30. Further, the 20x20 post-excavation frequency will be limited to PCB analysis. Confirmatory analysis for the non-PCB contaminants will be in accordance with the NJDEP-approved frequency of 30x30. Any on-site non-LNAPL areas or off-site excavation areas with PCBs > 50 ppm will be sampled on a 20 x 20 grid.

Attachment 3 – Quality Assurance Project Plan

Section 3.2.1.2 – Waste Classification Samples: Please be aware that samples collected for disposal purposes (i.e., to select an appropriate disposal facility) must be collected in-situ (and not from stockpiles).

Weston Response: Weston will utilize our 2007 site data to determine which material is identified as TSCA regarding off-site disposal. We will identify the potential disposal facilities under separate cover before sending off the first shipment. We will collect samples on a frequency identified by the selected disposal vendor(s), and we will provide this information to EPA along with the disposal vendor information under separate cover at a later date. If Weston collects in-situ PCB samples from an area that was previously not considered TSCA waste and the PCB concentration is detected at 50 ppm or more in the new sample, the materials will be managed as TSCA.

Attachment 5 – Hatco Air Monitoring and Odor Control Program

Development of Action Levels: We suggest that a single action level for PCBs in air be developed for use throughout the site. Additionally, please note that the equation for determining the action level in areas of LNAPL uses a PCB concentration of 12,000 mg/kg; please note that the Agency has reviewed information indicating that PCB concentrations could be higher than this.

Weston Response: Based upon a review of historical site data, Weston recommends an action level of 2.72 mg/m3 above background for all areas of the site. When utilizing the highest historic site PCB concentration of 92,000 mg/kg, the OSHA exposure limit of 0.5 mg/m3 and a safety factor of 2, the most conservative action level calculated for the site is 2.72 mg/m3.

Action Level = exposure limit (0.5 mg/m3) X 1,000,000 = 2.72 mg/m3
maximum soil conc. (92,000 mg/kg) X safety factor (2)

Background particulate levels will be measured for up to three days prior to the initiation of any intrusive or earth moving activities. The average background level established for the site will be added to the calculated action level above, and the total of the two will serve as a site-specific action level for all intrusive activities for the duration of on-site and off-site activities. In the event that the site-specific action level is exceeded for a continuous 15-minute period (15-minute time weighted average, or TWA), the Weston representative will direct contractor personnel to halt site activities and initiate dust suppression.

Attachment 6 – Soil Reuse Proposal

Soil Reuse Sampling Frequency Variance Request: We reiterate the importance of using in-situ samples (as opposed to samples collected from stockpiles) for determining soil reuse. Weston may not stockpile soil and then sample to determine whether or not it meets the 500 mg/kg criteria (as is proposed on Page 7 of the attachment).

Weston Response: PCB aliquots will be collected in-situ from each excavation area slated for re-use, prior to excavation. PCB aliquots will be biased toward areas with the highest previously-detected PCB contamination, at a frequency of 1 per 500 yards or one per excavation area, whichever is more conservative. For areas in which overburden soils will be removed to excavate LNAPL impacted materials below, the overburden soil will be sampled in-situ at a rate of 1 per 500 yards across the excavation area. These overburden soil samples will be biased toward areas with highest detected historical contamination.

"In-situ" shall mean a sample of overburden, collected from the center of the bucket of an excavator, representing a "neat" excavation pass (i.e., the bucket does not consist of material that sloughed into the excavation). The material will be excavated and stockpiled in 500 cubic yard piles with one bucket sample representing the pile. If the analysis of the sample shows PCBs > 500 ppm (dry weight), then the whole pile will be disposed of off-site. Also, if during excavation there is visually-stained overburden or odors which indicate a possible chemical spill

or release, a sample of that material will also be collected and analyzed for PCBs and the material, if excavated, be segregated pending receipt of analysis.

If you have any questions, please do not hesitate to contact me at 732-417-5834.

Sincerely,

WESTON SOLUTIONS, INC.

Daniel Kopcow, P.E., P.M.P
Project Manager

cc: L. Vogel, NJDEP
P. Meyer, S. Castles (Chemtura)
V. Puranapanda, G. Kramer, C. Stella, S. Piatkowski (ACE)
K. Robbins (HDR)